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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

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Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**DEBTORS' AND SHAREHOLDER  
PROONENTS' RESPONSE TO  
REVISED SUPPLEMENTAL  
DISCLOSURE IN THE FORM OF A  
LETTER FROM THE TCC**

Date: April 7, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

Re: Docket No. 6636 and 6682

1 The TCC's revised Proposed Letter does nothing to address the multiple inaccuracies and  
2 falsehoods of the original letter. Yet, the TCC still seeks the shield of the Court's approval of  
3 these statements *and* wants to broadcast that imprimatur to fire claimants. The very first  
4 paragraph of the Proposed Letter states that "[t]he bankruptcy court approved or permitted the  
5 TCC sending this letter to you." Revised Proposed Letter [ECF 6682-1] at 1. The obvious  
6 intention is to give fire claimants the impression that the Court agrees with its contents. And,  
7 despite removal of the explicit recommendation not to vote on the Plan, the Proposed Letter can  
8 only be construed as intended to persuade fire claimants to withhold their ballots. There is no  
9 other plausible purpose of the communication.

10 For all the reasons previously stated, this is inappropriate. If the TCC wants to try to  
11 influence balloting on the Plan, the TCC should decide for itself what communication is  
12 appropriate under the Bankruptcy Code and take responsibility for any ensuing consequences of  
13 its actions. Any such communication must not reference or otherwise imply that the Court has  
14 reviewed or approved its contents, and the Court should not sanction or otherwise provide the  
15 immunity sought by the TCC.

16  
17 Dated: April 7, 2020

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KELLER BENVENUTTI KIM LLP

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